INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

January 13, 2004

TO: Interested Parties / Applicant

RE: The Braun Corporation / MPM 131-18143-00017

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

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January 13, 2004

Mr. William Roth
The Braun Corporation
P.O. Box 310
Winamac, IN 46996

Re: **131-18143**
First Minor Permit Modification to
Part 70 No.: T 131-7058-00017

Dear Mr. Roth:

The Braun Corporation was issued a permit on April 20, 1999 for a motor vehicle conversion plant. A letter requesting changes to this permit was received on July 14, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists increasing the production capacity of EnterVan Line No. 1 and EnterVan Line No. 2 from 15 vans to 18 vans per day each.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 15 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
MSS/MES
cc: File - Pulaski County
U.S. EPA, Region V
Pulaskit County Health Department
Air Compliance Section Inspector - Wanda Stanfield
Compliance Branch - Karen Ampil
Administrative and Development

Technical Support and Modeling - Michelle Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 131-7058-00017	
Original Signed By: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 20, 1999 Expiration Date: April 20, 2004

First Significant Source Modification 131-10831-00017, issued on August 2, 1999
First Administrative Amendment 131-11117-00017, issued on September 14, 1999
Second Administrative Amendment 131-12100-00017, issued on April 20 2000
Second Significant Source Modification 131-11788-00017, issued on June 7, 2000
First Significant Permit Modification 131-12887-00017, issued on May 7, 2001
First Reopening 131-13456-00017, issued on November 11, 2001
Second Significant Permit Modification 131-14480-00017, issued on May 10, 2002

First Significant Permit Modification: 131-18143-00017 Pages Modified: 5 - 7, 31 and 32	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:January 13, 2004

A. SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary motor vehicle conversion plant.

Responsible Official:	William R. Roth
Source Address:	623 West 11th Street, Winamac, IN 46996
Mailing Address:	P. O. Box 310, Winamac, IN 46996
Phone Number:	219-946-6153
SIC Code:	3711
County Location:	Pulaski
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Major Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Twelve (12) surface coating facilities and assembly areas in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating operations, identified as Enter/Ref. No. 1, with a maximum rating of 18.0 vans per day, consisting of one (1) primer booth, and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2 (formerly in flare paint shop). Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(5) EnterVan Line No. 2 refinishing surface coating operations, identified as Enter/Ref. No. 2, with a maximum rating of 18.0 vans per day, consisting of one (1) paint booth and one (1) primer booth (formerly in flare paint shop). Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.

(9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes insignificant activities, as defined in 326 IAC 2-7-1(21).

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(b) EnterVan Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(c) EnterVan Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(d) Bus/ParaTransit Van Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(e) Bus/ParaTransit Van Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(f) Axle/Door welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(g) Welding operations at Plant 3, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

(h) Touch-Up Booth/Oven No. 1 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.

(i) Touch-Up Booth/Oven No. 2 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.

(j) APD Door Shop at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.

(k) Powder Coating and Oven at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.

(l) Powder Coating Oven at Plant 3 with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.

(m) One (1) Burn Off Oven at Plant 3 equipped with two burners, with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.

(n) Space heaters with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Areas

Facility Description [326 IAC 2-7-5(15)]

Twelve (12) surface coating facilities and assembly areas in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating operations, identified as Enter/Ref. No. 1, with a maximum rating of 18.0 vans per day, consisting of one (1) primer booth, and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2 (formerly in flare paint shop). Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(5) EnterVan Line No. 2 refinishing surface coating operations, identified as Enter/Ref. No. 2, with a maximum rating of 18.0 vans per day, consisting of one (1) paint booth and one (1) primer booth (formerly in flare paint shop). Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 18.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.

(9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

Facility Description [326 IAC 2-7-5(15)] (continued)

Twelve (12) surface coating facilities and assembly areas in Plant 4, described as follows:

(10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. No. 1, Para/Un. No. 1 Para/Assem. No. 2, Para/Ref. No. 2, and Para/Un. No. 2 surface coating areas shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan and Bus/ParaTransit assembly and undercoating areas (Enter/Assem. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Un. No. 1, Para/Assem. No. 2 and Para/Un. No. 2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for Part 70
Minor Source and Permit Modifications

Source Background and Description

Source Name:	**The Braun Corporation**
Source Location:	**623 West 11th Street, Winamac, IN 46996**
County:	**Pulaski**
SIC Code:	**3711**
Operation Permit No.:	**T 131-7058-00017**
Operation Permit Issuance Date:	**April 20, 1999**
Minor Source Modification No.:	**MSM 131-17766-00017**
Minor Permit Modification No.:	**MPM 131-18143-00017**
Permit Reviewer:	**Michael S. Schaffer**

The Office of Air Quality (OAQ) has reviewed a modification application from The Braun Corporation relating to a proposed increase in capacity from 15 vans to 18 vans per day and/or change in operation of the following emission units:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) primer booth, and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2 (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(5) EnterVan Line No. 2 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) paint booth and one (1) primer booth (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates

independently of all other undercoating areas.

~~(13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.~~

History

On July 14, 2003, The Braun Corporation submitted an application to the OAQ requesting to increase the capacity of Enter Van Line Nos. 1 and 2 as well as to redistribute the operations of the flare paint shop to the refinishing operations of Enter Van Line Nos. 1 and 2. The Braun Corporation was issued a Part 70 permit on April 20, 1999. In addition, this source was issued its First Significant Source Modification 131-10831-00017 on August 2, 1999, First Administrative Amendment 131-11117-00017 on September 14, 1999, Second Administrative Amendment 131-12100-00017 on April 20 2000, Second Significant Source Modification 131-11788-00017 on June 7, 2000, First Significant Permit Modification 131-12887-00017 on May 7, 2001, First Reopening 131-13456-00017 on November 11, 2001, and Second Significant Permit Modification 131-14480-00017 on May 10, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 14, 2003. Additional information was received on August 27, September 9 and 25, 2003.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the unrestricted PTE before controls as a result of an increased capacity from both Enter Van Line No. 1 and Enter Van Line No. 2 of 3 vans per day. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Unrestricted Potential To Emit** (tons/year)
PM	4.56
PM_{10}	4.56
SO_2	-
VOC	13.7
CO	-
NO_X	-

HAPs	**Unrestricted Potential To Emit** (tons/year)
Xylene	0.902
Toluene	1.04
MIBK	0.282
Ethyl Benzene	0.172
Hexane	0.264
Glycol Ether	0.394
MEK	0.714
Methyl Alcohol	0.030
TOTAL	2.72

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4) since the potential to emit of this modification is greater than ten (10) tons of VOC pear year, but less than twenty-five (25) tons of VOC per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Permit Modification (MPM 131-18143-00017) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate Enter Van Line Nos. 1 and 2 at a capacity of 18 vans per day each.

County Attainment Status

The source is located in Pulaski County.

Pollutant	**Status**
PM_{10}	attainment

Pollutant	Status
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Pulaski County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less Than 100
PM_{10}	Less Than 100
SO_2	Less Than 100
VOC	Less Than 100
CO	Less Than 100
NO_X	Less Than 100

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the potential emissions on Page 3 of 8 of the TSD to T 131-7058-00017 plus those from the subsequent source modifications.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Increase capacity from 15 to 18 Vans Per Day Capacity for EnterVan Lines Nos. 1 and 2	4.56	4.56	-	13.7	-	-	Single 1.04 Total 2.72
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2.4.1-1 (New Source Toxics Control)

The proposed increase in production capacity from 15 to 18 vans per day in EnterVan Line Nos. 1 and 2 is considered a modification to existing coating lines. The increase in production capacity will not be considered a reconstruction as defined by NESHAP to the existing coating lines. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to EnterVan Line Nos. 1 and 2.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The proposed increase in production capacity from 15 to 18 vans per day in EnterVan Line Nos. 1 and 2 does not change the methods used in delivering solids to the applicators. Therefore, the requirements of 326 IAC 6-3-2 are still applicable. As a result, with the exception of removing the flare paint shop, Condition D.1.1 of SPM 131-12887-00017, issued on May 7, 2001 will remain unchanged.

326 IAC 8-1-6 (New facilities, general reduction requirements)

The proposed increase in production capacity from 15 to 18 vans per day in EnterVan Line Nos. 1 and 2 does not increase the unrestricted potential to emit VOC from the refinishing surface coating operations in EnterVan Line Nos. 1 and 2 to greater than or equal to twenty-five (25) tons per year each. Therefore, the requirements of 326 IAC 8-1-6 do not apply. As a result, Condition D.1.2(c) of SPM 131-14480-00017, issued on May 10, 2002 will remain unchanged.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The proposed increase in production capacity from 15 to 18 vans per day in EnterVan Line Nos. 1 and 2 does not change the VOC content of the coatings used at the assembly and undercoating areas in EnterVan Line Nos. 1 and 2. Therefore, the requirements of 326 IAC 8-2-9 are still applicable to the assembly and undercoating areas in EnterVan Line Nos. 1 and 2. As a result, Condition D.1.2(a) of SPM 131-14480-00017, issued on May 10, 2002 will remain unchanged.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no additional compliance monitoring requirements applicable to the proposed modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

~~Thirteen (13)~~ **Twelve (12)** surface coating facilities and assembly areas in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) primer booth, and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2 (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating

of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(5) EnterVan Line No. 2 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) paint booth and one (1) primer booth (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.

(9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

~~(13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.~~

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Areas

Facility Description [326 IAC 2-7-5(15)]

~~Thirteen (13)~~ **Twelve (12)** surface coating facilities and assembly areas in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) primer booth, and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2 (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(5) EnterVan Line No. 2 refinishing surface coating ~~booth~~ **operations**, identified as Enter/Ref. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day**, consisting of one (1) paint booth and one (1) primer booth (formerly in flare paint shop)**. Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of ~~15.0~~ **18.0** vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

(7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.

(9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

Facility Description [326 IAC 2-7-5(15)] (continued)

~~Thirteen (13)~~ **Twelve (12)** surface coating facilities and assembly areas in Plant 4, described as follows:

(10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

~~(13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. No. 1, Para/Un. No. 1 Para/Assem. No. 2, Para/Ref. No. 2, **and** Para/Un. No. 2 ~~and FP No. 1~~ surface coating areas shall not exceed the pound per hour emission rate established as E in the following formula:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 131-17766-00017 and Minor Permit Modification No. 131-18143-00017.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Minor Source Modification: 131-17766
Minor Permit Modification: 131-18143
Plt ID: 131-00017
Reviewer: Michael S. Schaffer
Date: July 14, 2003

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Increase (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency	Substrate Coated
EnterVan Line #1																	
Assembly Operations																	
Manus-Bond Adhesive	12.50	1.00%	0.0%	1.0%	0.0%	99.00%	1.14800	0.125	0.13	0.13	0.02	0.43	0.079	0.000	0.13	100%	Metal
Siliprene Adhesive	7.19	0.00%	0.0%	0.0%	0.0%	30.10%	0.90500	0.125	0.00	0.00	0.00	0.00	0.000	***0.891***	0.00	75%	Metal
WS8999 Acrysol	6.46	100.00%	0.0%	100.0%	0.0%	0.00%	0.15600	0.125	6.46	6.46	0.13	3.02	***0.552***	0.000	N/A	100%	Accessory Solvent
Kwik Prep	7.33	99.25%	0.0%	99.3%	0.0%	0.75%	0.03200	0.125	7.28	7.28	0.03	0.70	***0.127***	0.000	970.00	100%	Accessory Solvent
3M Green Contact Adhesive	6.58	53.10%	0.0%	53.1%	0.0%	27.20%	0.24500	0.125	3.49	3.49	0.11	2.57	***0.469***	0.103	12.85	75%	Plastic
Subtotal											**0.28**	**6.72**	**1.15**	**0.891**			
Primer Booth - Refinishing																	
Primer - K 38	12.45	32.20%	0.0%	32.2%	0.0%	67.80%	0.07290	0.125	4.01	4.01	0.04	0.88	0.160	0.084	5.91	75%	Minivan
Primer - K 201	8.03	60.24%	0.0%	60.2%	0.0%	39.76%	0.01820	0.125	4.84	4.84	0.01	0.26	0.048	0.008	12.17	75%	Minivan
Primer - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.01820	0.125	7.12	7.12	0.02	0.39	0.071	0.000	N/A	75%	Minivan
Sealer - DP 50 LF	*11.75*	*35.36%*	*0.0%*	*35.4%*	*0.0%*	*64.64%*	*0.21000*	0.125	*4.15*	*4.15*	*0.11*	*2.62*	***0.478***	***0.218***	*6.43*	75%	*Minivan*
Sealer - DP 402 LF	*7.75*	*67.20%*	*0.0%*	*67.2%*	*0.0%*	*32.80%*	*0.10500*	0.125	*5.21*	*5.21*	*0.07*	*1.64*	***0.299***	***0.037***	*15.88*	75%	*Minivan*
Seaker - DT 885 (Solvent)	*7.12*	*100.00%*	*0.0%*	*100.0%*	*0.0%*	*0.00%*	*0.10500*	0.125	*7.12*	*7.12*	*0.09*	*2.24*	***0.409***	***0.000***	*N/A*	75%	*Minivan*
Subtotal											**0.27**	**6.50**	**1.19**	**0.255**			
Paint Booth #1 and Paint Booth #2																	
Clearcoat - DCU 2042	7.91	50.98%	0.0%	51.0%	0.0%	49.02%	0.10500	0.125	4.03	4.03	0.053	1.27	0.232	***0.056***	8.23	75%	Minivan
Clearcoat - DCX 61	8.95	16.09%	0.0%	16.1%	0.0%	83.91%	0.02600	0.125	1.44	1.44	0.005	0.112	0.020	***0.027***	1.72	75%	Minivan
Clearcoat - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02600	0.125	7.12	7.12	0.023	0.555	0.101	***0.000***	N/A	75%	Minivan
Base Paint - DBC	8.52	77.50%	0.0%	77.5%	0.0%	22.50%	0.07900	0.125	6.60	6.60	***0.065***	***1.56***	***0.286***	0.021	29.35	75%	Minivan
Base Paint - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.07900	0.125	7.12	7.12	***0.070***	***1.69***	***0.308***	0.000	N/A	75%	Minivan
Sealer - K 36	12.61	33.61%	0.0%	33.6%	0.0%	41.02%	0.04840	0.125	4.24	4.24	0.026	0.615	0.112	0.055	10.33	75%	Minivan
Sealer - DMC 903	8.38	47.32%	0.0%	47.3%	0.0%	47.00%	0.02420	0.125	3.97	3.97	0.012	0.288	0.053	0.015	8.44	75%	Minivan
Sealer - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02420	0.125	7.12	7.12	0.022	0.517	0.094	0.000	N/A	75%	Minivan
Sealer - DCX 8	8.93	18.49%	0.0%	18.5%	0.0%	75.35%	0.01210	0.125	1.65	1.65	0.002	0.060	0.011	0.012	2.19	75%	Minivan
Accesory Solvent - DTL 16	6.67	70.00%	0.0%	70.0%	0.0%	30.00%	0.03200	0.125	4.67	4.67	0.019	0.448	***0.082***	0.000	15.56	100%	Minivan
Accessory Solvent - DX 330 Wax Remover	6.36	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	0.125	6.36	6.36	0.020	0.477	***0.087***	0.000	N/A	100%	Minivan
Accessory Solvent - MS 100	6.74	100.00%	20.0%	80.0%	20.0%	0.00%	0.02100	0.125	6.74	5.39	0.014	0.340	***0.062***	0.000	N/A	100%	Minivan
Accessory Solvent - DX 103	6.57	99.85%	0.0%	99.9%	0.0%	0.15%	0.00900	0.125	6.56	6.56	0.007	0.177	***0.032***	0.000	4373.43	100%	Minivan
Subtotal											**0.196**	**4.694**	**0.857**	**0.082**			
Undercoating																	
R477 Sound Shield	9.66	48.20%	2.0%	46.2%	2.0%	49.80%	1.41200	0.125	4.55	4.46	***0.79***	***18.90***	***3.45***	***0.97***	8.96	75%	Minivan
AA Water Based Rust Protector	8.58	55.00%	32.0%	23.0%	46.0%	44.00%	0.10200	0.125	3.65	1.97	***0.03***	***0.60***	***0.110***	***0.05***	4.49	75%	Minivan
Bond-Title 7 Rubberized UC	7.58	38.80%	0.0%	38.8%	0.0%	61.20%	0.04600	0.125	2.94	2.94	***0.02***	***0.41***	***0.074***	***0.03***	4.81	75%	Minivan
Subtotal											**0.83**	**19.91**	**3.63**	**1.05**			

Note that the potential to emit of Paint 1 and Paint 2 is a combined total for the two booths
All coatings are worst case "as applied" to the applicators

PM Control Efficiency 0.00%

Potential to Emit	**Add worst case coating to all solvents**	**Uncontrolled**	**1.58**	**37.83**	**6.83**	**2.28**
		Controlled	**1.58**	**37.83**	**6.83**	**2.28**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Minor Source Modification: 131-17766
Minor Permit Modification: 131-18143
Plt ID: 131-00017
Reviewer: Michael S. Schaffer
Date: July 14, 2003

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Increase (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency	Substrate Coated
EnterVan Line #2																	
Assembly Operations																	
Manus-Bond Adhesive	12.50	1.00%	0.0%	1.0%	0.0%	99.00%	1.14800	0.125	0.13	0.13	0.02	0.43	0.079	0.000	0.13	100%	Metal
Siliprene Adhesive	7.19	0.00%	0.0%	0.0%	0.0%	30.10%	0.90500	0.125	0.00	0.00	0.00	0.00	0.000	***0.891***	0.00	75%	Metal
WS8999 Acrysol	6.46	100.00%	0.0%	100.0%	0.0%	0.00%	0.15600	0.125	6.46	6.46	0.13	3.02	***0.552***	0.000	N/A	100%	Accessory Solvent
Kwik Prep	7.33	99.25%	0.0%	99.3%	0.0%	0.75%	0.03200	0.125	7.28	7.28	0.03	0.70	***0.127***	0.000	970.00	100%	Accessory Solvent
3M Green Contact Adhesive	6.58	53.10%	0.0%	53.1%	0.0%	27.20%	0.24500	0.125	3.49	3.49	0.11	2.57	***0.469***	0.103	12.85	75%	Plastic
Subtotal											**0.28**	**6.72**	**1.15**	**0.891**			
Primer Booth - Refinishing																	
Primer - K 38	12.45	32.20%	0.0%	32.2%	0.0%	67.80%	0.07290	0.125	4.01	4.01	0.04	0.88	0.160	0.084	5.91	75%	Minivan
Primer - K 201	8.03	60.24%	0.0%	60.2%	0.0%	39.76%	0.01820	0.125	4.84	4.84	0.01	0.26	0.048	0.008	12.17	75%	Minivan
Primer - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.01820	0.125	7.12	7.12	0.02	0.39	0.071	0.000	N/A	75%	Minivan
Sealer - DP 50 LF	*11.75*	*35.36%*	*0.0%*	*35.4%*	*0.0%*	*64.64%*	*0.21000*	0.125	*4.15*	*4.15*	*0.11*	*2.62*	***0.478***	***0.218***	*6.43*	75%	*Minivan*
Sealer - DP 402 LF	*7.75*	*67.20%*	*0.0%*	*67.2%*	*0.0%*	*32.80%*	*0.10500*	0.125	*5.21*	*5.21*	*0.07*	*1.64*	***0.299***	***0.037***	*15.88*	75%	*Minivan*
Seaker - DT 885 (Solvent)	*7.12*	*100.00%*	*0.0%*	*100.0%*	*0.0%*	*0.00%*	*0.10500*	0.125	*7.12*	*7.12*	*0.09*	*2.24*	***0.409***	***0.000***	*N/A*	75%	*Minivan*
Subtotal											**0.27**	**6.50**	**1.19**	**0.255**			
Paint Booth																	
Clearcoat - DCU 2042	7.91	50.98%	0.0%	51.0%	0.0%	49.02%	0.10500	0.125	4.03	4.03	0.053	1.27	0.232	***0.056***	8.23	75%	Minivan
Clearcoat - DCX 61	8.95	16.09%	0.0%	16.1%	0.0%	83.91%	0.02600	0.125	1.44	1.44	0.005	0.112	0.020	***0.027***	1.72	75%	Minivan
Clearcoat - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02600	0.125	7.12	7.12	0.023	0.555	0.101	***0.000***	N/A	75%	Minivan
Base Paint - DBC	8.52	77.50%	0.0%	77.5%	0.0%	22.50%	0.07900	0.125	6.60	6.60	***0.065***	***1.56***	***0.286***	0.021	29.35	75%	Minivan
Base Paint - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.07900	0.125	7.12	7.12	***0.070***	***1.69***	***0.308***	0.000	N/A	75%	Minivan
Sealer - K 36	12.61	33.61%	0.0%	33.6%	0.0%	41.02%	0.04840	0.125	4.24	4.24	0.026	0.615	0.112	0.055	10.33	75%	Minivan
Sealer - DMC 903	8.38	47.32%	0.0%	47.3%	0.0%	47.00%	0.02420	0.125	3.97	3.97	0.012	0.288	0.053	0.015	8.44	75%	Minivan
Sealer - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02420	0.125	7.12	7.12	0.022	0.517	0.094	0.000	N/A	75%	Minivan
Sealer - DCX 8	8.93	18.49%	0.0%	18.5%	0.0%	75.35%	0.01210	0.125	1.65	1.65	0.002	0.060	0.011	0.012	2.19	75%	Minivan
Accesory Solvent - DTL 16	6.67	70.00%	0.0%	70.0%	0.0%	30.00%	0.03200	0.125	4.67	4.67	0.019	0.448	***0.082***	0.000	15.56	100%	Minivan
Accessory Solvent - DX 330 Wax Remover	6.36	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	0.125	6.36	6.36	0.020	0.477	***0.087***	0.000	N/A	100%	Minivan
Accessory Solvent - MS 100	6.74	100.00%	20.0%	80.0%	20.0%	0.00%	0.02100	0.125	6.74	5.39	0.014	0.340	***0.062***	0.000	N/A	100%	Minivan
Accessory Solvent - DX 103	6.57	99.85%	0.0%	99.9%	0.0%	0.15%	0.00900	0.125	6.56	6.56	0.007	0.177	***0.032***	0.000	4373.43	100%	Minivan
Subtotal											**0.196**	**4.694**	**0.857**	**0.082**			
Undercoating																	
R477 Sound Shield	9.66	48.20%	2.0%	46.2%	2.0%	49.80%	1.41200	0.125	4.55	4.46	***0.79***	***18.90***	***3.45***	***0.97***	8.96	75%	Minivan
AA Water Based Rust Protector	8.58	55.00%	32.0%	23.0%	46.0%	44.00%	0.10200	0.125	3.65	1.97	***0.03***	***0.60***	***0.110***	***0.05***	4.49	75%	Minivan
Bond-Title 7 Rubberized UC	7.58	38.80%	0.0%	38.8%	0.0%	61.20%	0.04600	0.125	2.94	2.94	***0.02***	***0.41***	***0.074***	***0.03***	4.81	75%	Minivan
Subtotal											**0.83**	**19.91**	**3.63**	**1.05**			

All coatings are worst case "as applied" to the applicators

PM Control Efficiency 0.00%

Potential to Emit	**Add worst case coating to all solvents**	**Uncontrolled**	**1.58**	**37.83**	**6.83**	**2.28**
		Controlled	**1.58**	**37.83**	**6.83**	**2.28**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Minor Source Modification: 131-17766
Minor Permit Modification: 131-18143
Plt ID: 131-00017
Reviewer: Michael S. Schaffer
Date: July 14, 2003

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Increase (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % MEK	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	MEK Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
EnterVan Line #1																			
Assembly Operations																			
Manus-Bond Adhesive	12.50	1.14800	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Siliprene Adhesive	7.19	0.90500	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
WS8999 Acrysol	6.46	0.15600	0.125	31.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00%	0.00%	***0.171***	0.000	0.000	***0.033***	0.000	0.000	0.000	0.000
Kwik Prep	7.33	0.03200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3M Green Contact Adhesive	6.58	0.24500	0.125	0.00%	15.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.000	***0.132***	0.000	0.000	***0.132***	0.000	0.000	0.000
Worst Case Individual HAPs Subtotal												**0.171**	**0.132**	**0.000**	**0.033**	**0.132**	**0.000**	**0.000**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.469**
Primer Booth - Refinishing																			
Primer - K 38	12.45	0.07290	0.125	20.00%	5.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	***0.099***	0.025	0.000	***0.025***	0.000	0.000	0.000	0.000
Primer - K 201	8.03	0.01820	0.125	5.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.004***	0.008	0.000	0.000	0.000	0.000	0.000	0.000
Primer - DT 885 (Solvent)	7.12	0.01820	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	***0.007***	0.014	0.000	0.000	0.000	0.000	0.014	0.000
Sealer - DP 50 LF	*11.75*	*0.21000*	*0.125*	*5.00%*	*5.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.068*	***0.068***	***0.068***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Sealer - DP 402 LF	*7.75*	*0.10500*	*0.125*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*40.00%*	*20.00%*	*0.00%*	*0.000*	***0.022***	*0.000*	*0.000*	*0.000*	***0.178***	***0.089***	*0.000*
Seaker - DT 885 (Solvent)	*7.12*	*0.10500*	*0.125*	*10.00%*	*20.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.00%*	*0.041*	***0.082***	*0.000*	*0.000*	*0.000*	*0.000*	***0.082***	*0.000*
Worst Case Individual HAPs Subtotal												**0.110**	**0.172**	**0.068**	**0.025**	**0.000**	**0.178**	**0.185**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.711**
Paint Booth #1 and Paint Booth #2																			
Clearcoat - DCU 2042	7.91	0.10500	0.125	30.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.136***	0.000	0.045	0.000	0.000	0.000	0.000	0.000
Clearcoat - DCX 61	8.95	0.02600	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.000***	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Clearcoat - DT 885	7.12	0.02600	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	***0.010***	0.020	0.000	0.000	0.000	0.000	0.020	0.000
Base Paint - DBC	*8.52*	*0.07900*	*0.125*	*20.00%*	*20.00%*	*20.00%*	*5.00%*	*0.00%*	*5.00%*	*30.00%*	*0.00%*	*0.074*	***0.074***	***0.074***	*0.018*	*0.000*	***0.018***	***0.111***	*0.000*
Base Paint - DT 885	*7.12*	*0.07900*	*0.125*	*10.00%*	*20.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.00%*	*0.031*	***0.062***	*0.000*	*0.000*	*0.000*	*0.000*	***0.062***	*0.000*
Sealer - K 36	12.61	0.04840	0.125	20.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.067	0.000	0.000	***0.017***	0.000	0.000	0.000	0.000
Sealer - DMC 903	8.38	0.02420	0.125	10.00%	45.30%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.011	0.050	0.000	***0.006***	0.000	0.000	0.000	0.000
Sealer - DT 885	7.12	0.02420	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.009	0.019	0.000	0.000	0.000	0.000	0.019	0.000
Sealer - DCX 8	8.93	0.01210	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.012	0.000	0.000
Accesory Solvent - DTL 16	*6.67*	*0.03200*	*0.125*	*20.00%*	*30.00%*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	***0.023***	***0.035***	*0.000*	***0.006***	*0.000*	*0.000*	*0.000*	*0.000*
Accessory Solvent - DX 330 Wax Remover	*6.36*	*0.02500*	*0.125*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.000*	***0.004***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Accessory Solvent - MS 100	*6.74*	*0.02100*	*0.125*	*0.00%*	*50.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.000*	***0.039***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	***0.015***
Accessory Solvent - DX 103	*6.57*	*0.00900*	*0.125*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Worst Case Individual HAPs Subtotal												**0.170**	**0.213**	**0.074**	**0.028**	**0.000**	**0.018**	**0.172**	**0.015**
																		Worst Case Combination of HAPs Subtotal	**0.645**
Undercoating																			
R477 Sound Shield	9.66	1.41200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
AA Water Based Rust Protector	8.58	0.10200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Bond-Title 7 Rubberized UC	7.58	0.04600	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Worst Case Individual HAPs Subtotal												**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.000**
Note that the potential to emit of Paint 1 and Paint 2 is a combined total for the two booths											**Worst Case Total Individual HAPs Total**	**0.451**	**0.518**	**0.141**	**0.086**	**0.132**	**0.197**	**0.357**	**0.015**
All coatings are worst Case "as applied" to the applicators																		**Worst Case Combination of HAPs Total**	**1.36**

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Minor Source Modification: 131-17766
Minor Permit Modification: 131-18143
Plt ID: 131-00017
Reviewer: Michael S. Schaffer
Date: July 14, 2003

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Increase (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % MEK	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	MEK Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
EnterVan Line #2																			
Assembly Operations																			
Manus-Bond Adhesive	12.50	1.14800	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Siliprene Adhesive	7.19	0.90500	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
WS8999 Acrysol	6.46	0.15600	0.125	31.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00%	0.00%	***0.171***	0.000	0.000	***0.033***	0.000	0.000	0.000	0.000
Kwik Prep	7.33	0.03200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3M Green Contact Adhesive	6.58	0.24500	0.125	0.00%	15.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.000	***0.132***	0.000	0.000	***0.132***	0.000	0.000	0.000
Worst Case Individual HAPs Subtotal												**0.171**	**0.132**	**0.000**	**0.033**	**0.132**	**0.000**	**0.000**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.469**
Primer Booth - Refinishing																			
Primer - K 38	12.45	0.07290	0.125	20.00%	5.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	***0.099***	0.025	0.000	***0.025***	0.000	0.000	0.000	0.000
Primer - K 201	8.03	0.01820	0.125	5.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.004***	0.008	0.000	0.000	0.000	0.000	0.000	0.000
Primer - DT 885 (Solvent)	7.12	0.01820	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	***0.007***	0.014	0.000	0.000	0.000	0.000	0.014	0.000
Sealer - DP 50 LF	*11.75*	*0.21000*	*0.125*	*5.00%*	*5.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.068*	***0.068***	***0.068***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Sealer - DP 402 LF	*7.75*	*0.10500*	*0.125*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*40.00%*	*20.00%*	*0.00%*	*0.000*	***0.022***	*0.000*	*0.000*	*0.000*	***0.178***	***0.089***	*0.000*
Seaker - DT 885 (Solvent)	*7.12*	*0.10500*	*0.125*	*10.00%*	*20.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.00%*	*0.041*	***0.082***	*0.000*	*0.000*	*0.000*	*0.000*	***0.082***	*0.000*
Worst Case Individual HAPs Subtotal												**0.110**	**0.172**	**0.068**	**0.025**	**0.000**	**0.178**	**0.185**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.711**
Paint Booth																			
Clearcoat - DCU 2042	7.91	0.10500	0.125	30.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.136***	0.000	0.045	0.000	0.000	0.000	0.000	0.000
Clearcoat - DCX 61	8.95	0.02600	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	***0.000***	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Clearcoat - DT 885	7.12	0.02600	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	***0.010***	0.020	0.000	0.000	0.000	0.000	0.020	0.000
Base Paint - DBC	*8.52*	*0.07900*	*0.125*	*20.00%*	*20.00%*	*20.00%*	*5.00%*	*0.00%*	*5.00%*	*30.00%*	*0.00%*	*0.074*	***0.074***	***0.074***	*0.018*	*0.000*	***0.018***	***0.111***	*0.000*
Base Paint - DT 885	*7.12*	*0.07900*	*0.125*	*10.00%*	*20.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.00%*	*0.031*	***0.062***	*0.000*	*0.000*	*0.000*	*0.000*	***0.062***	*0.000*
Sealer - K 36	12.61	0.04840	0.125	20.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.067	0.000	0.000	***0.017***	0.000	0.000	0.000	0.000
Sealer - DMC 903	8.38	0.02420	0.125	10.00%	45.30%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.011	0.050	0.000	***0.006***	0.000	0.000	0.000	0.000
Sealer - DT 885	7.12	0.02420	0.125	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.009	0.019	0.000	0.000	0.000	0.000	0.019	0.000
Sealer - DCX 8	8.93	0.01210	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.012	0.000	0.000
Accesory Solvent - DTL 16	*6.67*	*0.03200*	*0.125*	*20.00%*	*30.00%*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	***0.023***	***0.035***	*0.000*	***0.006***	*0.000*	*0.000*	*0.000*	*0.000*
Accessory Solvent - DX 330 Wax Remover	*6.36*	*0.02500*	*0.125*	*0.00%*	*5.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.000*	***0.004***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Accessory Solvent - MS 100	*6.74*	*0.02100*	*0.125*	*0.00%*	*50.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*20.00%*	*0.000*	***0.039***	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	***0.015***
Accessory Solvent - DX 103	*6.57*	*0.00900*	*0.125*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Worst Case Individual HAPs Subtotal												**0.170**	**0.213**	**0.074**	**0.028**	**0.000**	**0.018**	**0.172**	**0.015**
																		Worst Case Combination of HAPs Subtotal	**0.645**
Undercoating																			
R477 Sound Shield	9.66	1.41200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
AA Water Based Rust Protector	8.58	0.10200	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Bond-Title 7 Rubberized UC	7.58	0.04600	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Worst Case Individual HAPs Subtotal												**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
																		Worst Case Combination of HAPs Subtotal	**0.000**
All coatings are worst case "as applied" to the applicators											**Worst Case Total Individual HAPs Total**	**0.451**	**0.518**	**0.141**	**0.086**	**0.132**	**0.197**	**0.357**	**0.015**
																		Worst Case Combination of HAPs Total	**1.36**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs